



SHERWIN-WILLIAMS.

THE SHERWIN-WILLIAMS COMPANY
Environmental, Health & Regulatory Services
101 Prospect Avenue NW
Cleveland, Ohio 44115-1075
Facsimile (216) 566-2730

June 29, 2009

Mr. Ray Klimcsak
U.S. Environmental Protection Agency – Region 2
290 Broadway 19th Floor
New York, New York 10007-1866

RE: Response to EPA Letter dated May 18, 2009
The Sherwin-Williams Company (February 18, 2009) Response to EPA Letter dated January 14, 2009 EPA's Comments on the *"Revised" Route 561 Dump Site Ground Water Contour Maps* (dated August 29, 2008)

The Sherwin-Williams Company Sites – RI/FS Activities
Gibbsboro, New Jersey
Administrative Order Index No. II CERCLA-02-99-2035

Dear Mr. Klimcsak:

The Sherwin-Williams Company (Sherwin-Williams) has prepared this reply in response to the U.S. Environmental Protection Agency (EPA) letter dated May 18, 2009 regarding EPA's review of Sherwin-Williams' *Route 561 Dump Site Groundwater Investigation – Technical Memo* dated April 29, 2009.

We are providing a point-by-point response to the detailed comments contained within the May 18, 2009 letter, and in order to ease your review, have included the text from that letter which is depicted in *italics*. Sherwin-Williams' response immediately follows each EPA comment in **bold**. A copy of the May 18, 2009 letter is included as an attachment.

Comments

1. *EPA requests to be present for the final selection of the 3 proposed pore water sample locations.*

Sherwin-Williams will coordinate the final selection of the 3 proposed pore water sample locations with EPA. Sherwin-Williams proposes that a site walk be scheduled so that EPA and/or their oversight contractor can participate in the selection of these sample locations.

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2. *EPA requests that additional clarification be provided in regards to the proposed collection of purge water during monitoring well installation operations, as currently described in Appendix A, Page A-12 of the Route 561 Dump Site Technical Memo. The text currently states that purge water will be collected in 55-gallon drums. This is contrary to previous discussions with Sherwin-Williams when discussing the fate of purge water during monitoring well re-development activities at the Former Manufacturing Plant (FMP). Please ensure that proper protocols are utilized and accurately presented in the Technical Memo.*

Sherwin-Williams is proposing that the development water will be discharged to the ground adjacent to the monitoring well. Discharge of the development water to the ground surface where the water is considered to be contaminated is permissible by the NJDEP August 2005 "Field Sampling Procedures Manual" provided the following conditions are met: 1) the water is not permitted to migrate off-site; 2) there is no potential for contaminating a previously uncontaminated aquifer; and 3) the discharge will not cause an increase to ground surface soil contamination. As provided in the June 2007 "NJDES Discharges to Ground Water Technical Manual for the Site Remediation Program", discharges to groundwater at remediation sites associated with the installation, development, and sampling of monitoring wells do not require a written pre-approval from the NJDEP or public notification.

3. *It is stated in Appendix A (Page A-13) that monitoring well samples will be collected for: Contract Laboratory Program (CLP) analyses for TAL metals, cyanide, total organic carbon (TOC), total dissolved solids (TDS) and total suspended solids (TSS). EPA is requesting that all wells be sampled and analyzed for full-scan parameters.*

Sherwin-Williams will analyze all groundwater samples collected from the monitoring wells for Target Compound List (TCL) Volatile Organic Compounds (VOCs), TCL Semivolatile Organic Compounds (SVOCs); Target Analyte List (TAL) Metals plus cyanide, TCL Polychlorinated Biphenyls (PCBs) and Pesticides as well as Total Organic Carbon (TOC), Total Dissolved Solids (TDS) and Total Suspended Solids (TSS).

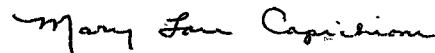
4. *An "un-signed" copy of EPA's August 14, 2007 Comment Letter (on Response to EPA Letter dated August 7, 2006 – Appendix A [Dump Site Groundwater Investigation – November 30, 2006]) was submitted as part of the Route 561 Dump Site Groundwater Technical Memo. Please submit the official signed copy that was mailed to the Sherwin-Williams Company on August 14, 2007.*

Sherwin-Williams has attached the official signed copy of the above-referenced letter that was mailed to Sherwin-Williams on August 14, 2007. The date stamp on this letter is August 13, 2007. This signed copy should replace the unsigned copy of the same letter that was included with the Response to EPA Comment Letter Dated August 14, 2007 regarding review of November 30, 2006 Response to EPA Letter Dated August 7, 2006 - Appendix A (Dump Site Groundwater Investigation) that was dated April 29, 2009.

Please note that as part of this submission, Sherwin-Williams has included revised pages A-12 and A-13 of Appendix A that incorporates all the comments contained within this letter. Please replace the existing pages with these revised pages in the Appendix A document that was included with the *Response to EPA Comment Letter Dated August 14, 2007 regarding review of November 30, 2006 Response to EPA Letter Dated August 7, 2006 - Appendix A (Dump Site Groundwater Investigation)* that was dated April 29, 2009.

Should you have any questions or comments regarding this response, please do not hesitate to contact me at (216) 566-1794 or via e-mail at mlcapichioni@sherwin.com.

Sincerely,



Mary Lou Capichioni
Director Remediation Services

Attachment

cc: J. Josephson, USEPA
C. Howard, USEPA
M. Pensak, USEPA
W. Sy, USEPA
J. Doyon, NJDEP (4 copies)
H. Martin, ELM
S. Jones, Weston